

EXHIBIT 2

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,
Plaintiff

v

TIMOTHY CALLAHAN, ET AL.
Defendant(s)

C.A. NO. 04-11193NG

**PLAINTIFF, SHAWN DRUMGOLD'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS TO THE DEFENDANT, THE CITY OF BOSTON**

Now comes the Plaintiff pursuant to Fed.R.Civ.P. Rules 26 and 34 and requests the City of Boston to produce the following documents.

1. The Boston Police Department Bureau of Investigative Services' ledger of payment to informants for the period from August 1, 1988 through June 30, 1990 (to the extent the document contains names as opposed to numerical identifications of informants, the Defendant does not object to the redaction of the names with the exception of the names: Antonio Anthony, Ricky Evans, Theron Davis, London Williams or any witness interviewed at any time by any member of the Boston Police Department in connection with the murder of Tiffany Moore).
2. Any files and/or any reports, memos or receipts including any so called "20-6" reports kept at any time by the Bureau of Investigative Services of the Boston Police Department with which relate in any way to payments made to Antonio Anthony, Ricky Evans, Theron Davis, London Williams or any other witness interviewed at any time by any member of the Boston Police Department in connection with the murder of Tiffany Moore.
3. The confidential informant cards described by Joseph Dunford at his deposition which he stored in the safe of the Deputy Superintendent for the Bureau of Investigative Services which deal with or relate in any way to Antonio Anthony, Ricky Evans, Theron Davis

and London Williams or any other witness who was ever interviewed by the Boston Police Department in connection with the murder of Tiffany Moore.

4. Any document maintained by the Bureau of Investigative Services which relate in any way to payments directly or indirectly to, or on behalf of, Antonio Anthony, Ricky Evans, Theron Davis, London Williams or any other witness interviewed at any time by the Boston Police Department in connection with the murder of Tiffany Moore.
5. All documents which record, reflect or refer to the Bureau of Investigative Services File No. DE1537 as referred to in Exhibit 144 of the deposition of Joseph Dunford or any other DE file which refers in any way to Antonio Anthony, Ricky Evans, Theron Davis or London Williams or any other witness interviewed at any time by the Boston Police Department in connection with the murder of Tiffany Moore.
6. All policies of the Boston Police Department in effect from 1988 through 1990 which relate to payment of funds to, or on behalf of, informants, including but not limited to the Rule 21-81 referred to by Paul McDonough at his deposition.

Respectfully submitted,
Plaintiff Shawn Drumgold,
By His Attorney

Rosemary C Scapicchio
pr MR

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Respectfully submitted,
Plaintiff Shawn Drumgold,
By His Attorney

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